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From:

Sent: Tuesday, June 30, 2009 12:11:10 PM

To:

Cc:

Subject: RE: 1065 question

If the taxpayer agreed to the correct amount of the partnership items under a fair reading of the Form 870-P, i.e., there was a meeting of the minds as to the correct treatment, then under section 6224(c) the taxpayer and the government are bound to that correct treatment. Section 6224(c)(1) speaks in terms of the correct "determination" of the final amount of a partnership item. Not whether the beginning point (item as reported) may have been incorrectly reflected.